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May 26, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East, Room 1214 South
Brooklyn, NY 11201-1804

Re: Taveras v. Value Service & Repair Corp., et al.
Case No.: 22-cv-03416 (HG)(VMS)

Dear Judge Scanlon:

I represent the Defendants in the above-referenced matter and write jointly with the Plaintiff.

The parties respectfully request an adjournment of the May 31, 2023 status conference and the deadline for filing a response to the Complaint. The reason for these requests is that the parties previously attended a mediation session with an EDNY mediator and agreed to continue the mediation after Defendants produce confidential financial records subject to a protective order. On February 10, 2023 the parties submitted a proposed protective order to the Court related to the financial records the parties agreed Defendants will produce for mediation purposes. [ECF Doc. No. 28]. The parties respectfully request that the Court so order the proposed protective order so that Defendants can produce the financial records and the parties can continue settlement negotiations.

To the extent that the Court reschedules the conference, Plaintiff's counsel will be traveling overseas from June 1, to June 17, 2023, so the parties request that it be rescheduled to a date and time after June 17, 2023 and with sufficient time for the parties to complete mediation.

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/s/ Jamie S. Felsen